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of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**EMERGENCY MOTION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO
EXPEDITE CONSIDERATION OF
MOTION FOR LEAVE TO FILE
SUR-REPLY**

[No Hearing Requested]

1 **TO THE COURT, ALL PARTIES AND COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that the Official Committee of Unsecured Creditors appointed
3 in the above-captioned cases (the “Creditors’ Committee”)¹ hereby makes this emergency motion
4 (the “Emergency Motion”) pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure
5 and Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the
6 Northern District of California to expedite consideration of the Creditors’ Committee’s
7 contemporaneously-filed *Motion for Leave to File Sur-Reply* (the “Motion for Leave”) in
8 connection with the *Plan Proponents’ Joint Memorandum of Law and Omnibus Response in*
9 *Support of Confirmation of Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*
10 *Reorganization* [Docket No. 7528]. All grounds for this Motion have are submitted to this Court
11 in the Declaration of Gregory A. Bray, attached hereto as **Exhibit A**.

12 **PLEASE TAKE FURTHER NOTICE** that notice of this Emergency Motion has been
13 provided to the following parties:

14 *Attorneys for Debtors and Debtors in Possession*

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26 ¹ Capitalized terms not defined herein have the meanings ascribed to them in the *Debtors’ and Shareholder*
27 *Proponents’ Joint Chapter 11 Plan of Reorganization Dated May 22, 2020* [Docket No. 7521] (as it may be
28 amended, modified or supplemented from time to time, and together with any exhibits or schedules thereto, the
“Plan”).

1 *Attorneys for Shareholder Proponents*

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29 **PLEASE TAKE FURTHER NOTICE** that all communication regarding this Motion
30 may be directed to moving counsel at:

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DATED: June 1, 2020

Respectfully submitted,

MILBANK LLP

/s/ Gregory A. Bray
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